

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

MICHAEL GRECCO; MICHAEL GRECCO
PRODUCTIONS, INC.,

Plaintiffs,

v.

AGE FOTOSTOCK AMERICA, INC.,

Defendant.

Case No.: 1:21-cv-00423-JSR

DEFENDANT AGE FOTOSTOCK AMERICA, INC.'S NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and the Declaration of Nancy E. Wolff, dated March 4, 2021, and the exhibits thereto, defendant Age Fotostock America, Inc., by its attorneys, Cowan, DeBaets, Abrahams & Sheppard LLP, will move this Court at the United States District Court, 500 Pearl Street, New York, New York 10007, before the Honorable Jed S. Rakoff, on April 2, 2021 at 4:00 p.m. ET, or on another date and time to be designated by the Court, for an order dismissing plaintiffs Michael Grecco and Michael Grecco Productions, Inc.'s Complaint dated January 18, 2021 (Dkt. 1), pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim on which relief can be granted and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.1(b) and this Court's February 18, 2021 Order (Dkt. 13), answering papers, if any, must be served by March 18, 2021, and reply papers, if any, must be served by March 25, 2021.

Respectfully Submitted,

Dated: March 4, 2021
New York, New York

COWAN, DEBAETS, ABRAHAMS
& SHEPPARD LLP

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